

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

EUGENE KLINE, et al.,)	CASE NO. 3:08cv408
)	
Plaintiffs,)	JUDGE WALTER HERBERT RICE
)	
vs.)	
)	DECLARATION OF PAUL
)	GROBMAN IN OPPOSITION TO
MORTGAGE ELECTRONIC SECURITY)	THE DEFENDANTS' MOTIONS FOR
SYSTEMS, et al.,)	SUMMARY JUDGMENT
)	
Defendants.)	
)	

Paul Grobman, being duly sworn, deposes and says under the penalty of perjury:

1. I am the attorney for plaintiff in this action, and submit this Declaration in opposition to the motions for summary judgment filed by each of the defendants in this action.
2. Annexed as Exhibit A are the Note and Mortgage for Eugene Kline's first mortgage loan in the amount of \$160,000.00.
3. Annexed as Exhibit B are the Note and Mortgage for Eugene Kline's second mortgage loan in the amount of \$30,000.00.
4. Annexed as Exhibit C are excerpts from the deposition of Barclays Rule 30(b)(6) witness Matthew Perry dated February 25, 2015.
5. Annexed as Exhibit D is the Pooling & Servicing Agreement.
6. Annexed as Exhibit E is the 2005 Foreclosure Complaint against Mr. Kline.
7. Annexed as Exhibit F is a letter dated December 5, 2005 from the Reimer firm to Mr. Kline.

8. Annexed as Exhibit G is the 2007 Foreclosure Complaint against Mr. Kline.
9. Annexed as Exhibit H is the Assignment of Mortgage from MERS to Wells Fargo.
10. Annexed as Exhibit I is MERS' Answer in the 2007 Foreclosure Action.
11. Annexed as Exhibit J is a letter dated November 15, 2007 from Reimer Lorber to Mr. Kline's attorney.
12. Annexed as Exhibit K is a letter dated November 14, 2007 from Lerner Sampson to Mr. Kline's attorney.
13. Annexed as Exhibit L is a letter dated December 19, 2007 from Kline's attorney.
14. Annexed as Exhibit M is a letter dated February 7, 2008 from Reimer to Kline's attorney.
15. Annexed as Exhibit N is a letter dated is a letter dated February 19, 2008 from defendants MERS, WMC Mortgage and HomeEq to Kline's attorney.
16. Annexed as Exhibit O is a letter dated March 26, 2015 from Barclays' attorneys and attached documents.
17. Annexed as Exhibit P are excerpts from the June 10, 2015 d1772 deposition of Jacklin Cartmill.
18. Annexed as Exhibit Q are excerpts from the deposition of Patrick Gorrien.
19. Annexed as Exhibit R is Barclays' prior Escrow Activity History.
20. Annexed as Exhibit S are excerpts from the deposition of Revathi Jose.
21. Annexed as Exhibit T is an email dated June 25, 2015 from Russell Pope to plaintiff's attorney along with accompanying documents.

22. Annexed as Exhibit U are excerpts from the deposition of Sara Petersmann.



PAUL GROBMAN